## **EXHIBIT G**

## EXHIBIT 67 UNREDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

	1
1	UNITED STATES DISTRICT COURT
2	NORTHERN DISTRICT OF CALIFORNIA
3	
4	CISCO SYSTEMS, INC.,
5	Plaintiff,
6	vs. Civil Action No.
7	ARISTA NETWORKS, INC., 5:14-cv-5344-BLF
8	Defendant.
9	
10	
11	
12	HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
13	PURSUANT TO PROTECTIVE ORDER
14	
15	VIDEOTAPED DEPOSITION OF KENNETH DUDA,
16	VOLUME I
17	
18	February 12, 2016
19	9:31 a.m 6:09 p.m.
20	
21	555 Twin Dolphin Drive, 5th Floor
22	Redwood Shores, California
23	REPORTED BY:
24	James Beasley
25	CSR No. 12807, CCR No. 835, RPR

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58
 1
      have to slow down.
                "It describes"...
 2
 3
                THE WITNESS: A tunnelling encapsulation
      and forwarding rules, and not anything about the
 4
 5
      interface to manage those functions.
 6
                THE REPORTER: Thank you.
 7
      BY MR. PAK:
           Q. And, Mr. Duda, are you -- sitting here
 8
9
      today, are you aware of any industry standard that
10
      has actually been ratified by an industry standard
11
      setting organization that requires the use of a
12
      particular set of CLI commands?
13
          A. I'm not aware of any specific requirements
14
      along those lines, though I believe there are
      several that suggest CLI commands or show CLI
15
16
      commands as examples.
           Q. Okay. Are you aware of any industry
17
18
      standard that has actually been ratified by any
19
     industry standard setting organization that requires
20
     the use of a particular type of user interface?
          A. What do you mean by: "Type of user
21
22
     interface"?
23
               Graphical versus command line versus other
24
     types of user interfaces.
25
          A. I'm not aware of any standard that
```

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59
 1
      requires the use of a graphical user interface.
 2
          Q. Are you aware of any industry standard
3
      that's actually been ratified by any industry
 4
      standard organization that requires command-line
 5
     interfaces to be used rather than graphical user
 6
     interfaces?
7
          A. Well, let's see. I'm not sure. There are
 8
      standards that relate to management functions and
9
      define compatibility requirements; for example, the
10
      NETCONF standards define XML formats in which
11
      management data must be represented, so in some
12
      sense that's a type of interface, though typically
13
     the user interface would be built on -- on top of
14
     that.
15
               So I'm not sure, but I can't think of
16
      anything offhand. Let's put it that way.
17
          Q. Okay. Let me be very specific.
18
               With respect to the CLI commands that are
19
     used in Arista's interface which overlap with
20
      Cisco's CLI commands, are you aware of any specific
21
     industry standard that has been adopted by an
22
      industry standard setting organization that mandates
23
     the use of those specific commands?
24
          A. I am not.
25
           Q.
               Okay. Is it also true, Mr. Duda, that
```

example might be a movie which is itself screen

25

why Arista could not add additional functionality to the Linux interface that would allow Arista switches to comply with all of the various network protocols ratified by industry standards without utilizing the CLI commands that we've been discussing?

- A. Well, again, I think my -- my same confusion remains, which is that -- what I mean here by "native Linux interfaces" are interfaces provided by the Linux environment, the Linux community. And so if we provided, say, access to our BGP protocol, that -- it's ours; it wouldn't be part of Linux unless we made it part of Linux and the Linux community adopted it, which seems very hypothetical. I don't quite see how to get there, honestly.
- Q. Let me see if I can state it this way:

  Is it possible for Arista to utilize a

  combination of the Linux interface and additional

  tools that Arista would develop to access the

  various functionality related to industry ratified

  protocols in Arista switches without using any of

  the CLI commands that overlap with Cisco?
- A. It is certainly possible to create an alternate management approach for BGP that wouldn't use any commands that overlap with Cisco. But I think without designing a specific one it would be

```
based on your experience, the remaining 80 percent of Arista customers are telling you that they want to leverage their experience with Cisco IOS so that they can easily upgrade Cisco infrastructure to Arista's infrastructure?
```

- A. Well, again, the -- the purpose of this statement isn't really to be quantitative in that way. But I think what I'm trying to convey here is that many customers, certainly a -- a larger set compared to the people taking advantage of pure Linux interfaces, a larger set of customers take advantage of the fact that our command line is familiar and makes it easy to adopt our product.
- Q. And easily upgrade from Cisco's products that use IOS to Arista's products that use your CLI interface, correct?
  - A. Certainly there are customers who do that.
  - Q. Okay.

MR. SILBERT: I don't mean to interrupt, but one of these devices keeps dinging. Is there a way to just mute it or...

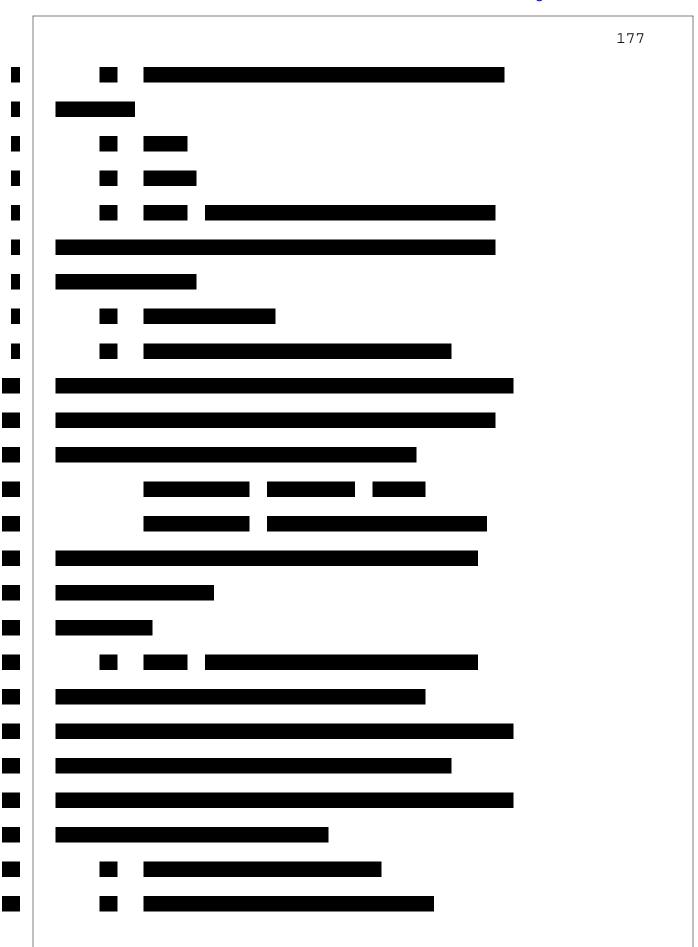
(Off-the-record discussion.)

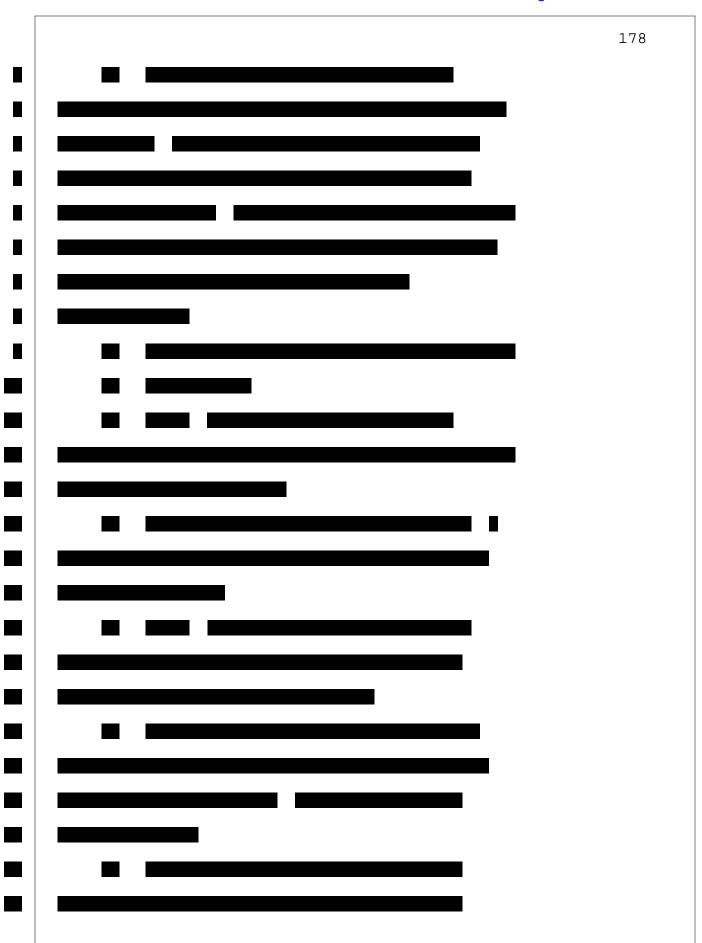
23 BY MR. PAK:

Q. So let me summarize this: What you state in this document, Mr. Duda, is that at least the

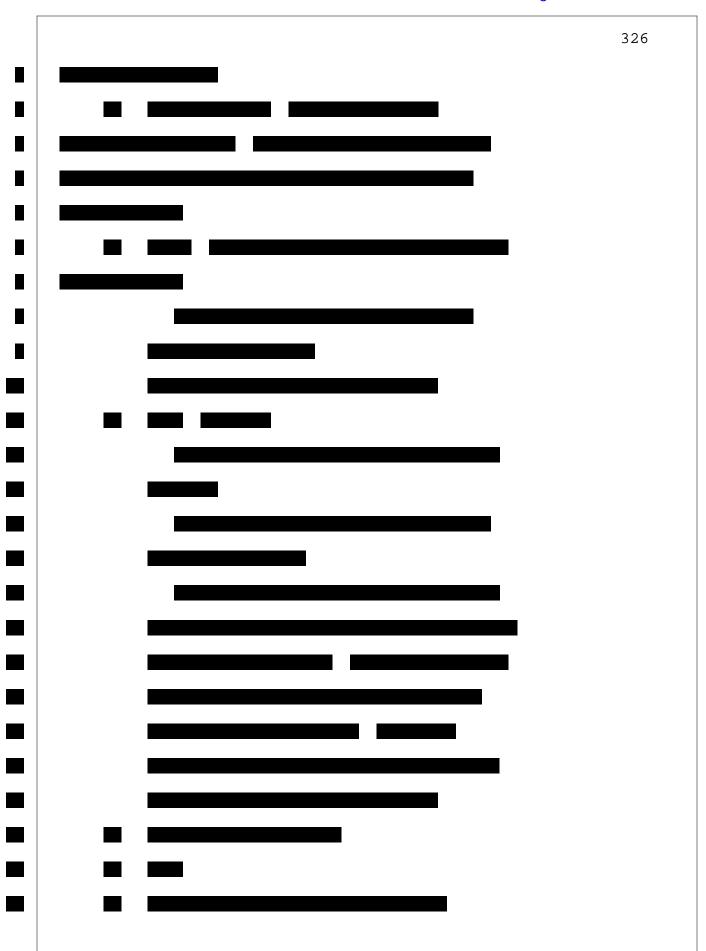
175 industry standard command set, which largely 1 overlaps Cisco. If we weren't able to use any of 2 3 those commands for that type of customer, it would be a larger impediment than for other customers that 4 are already using more of a Linux-like approach to 5 6 managing switches or it would be less --7 THE REPORTER: "It would be a larger 8 impediment," start there. THE WITNESS: -- it would be a larger 9 10 impediment than for customers using a more Linux-like approach to managing switches where the 11 12 impact would be less. I'm not sure how to quantify 13 it. 14 BY MR. PAK: 15 If you were -- if Arista was using a totally different CLI interface than what Cisco 16 offers, why couldn't the customers simply convert 17 their tools to work with that different CLI 18 19 interface as opposed to the Cisco CLI interface? 20 MR. SILBERT: Objection. Calls for 21 speculation. 22 THE WITNESS: As a technical matter, I 23 suspect that it's feasible to convert tools in most 24 cases but it makes things more difficult for the customer. First, there's the need to figure out how 25

```
176
 1
      to convert the tool to do the work. And now you
      have two versions of the tool which you have to
 2
 3
      maintain separately moving forward.
                THE REPORTER: "Now you have two
 4
      versions," start there.
 5
                THE WITNESS: -- two versions of the tool
 6
 7
      that you have to maintain separately moving forward.
 8
                So I think the -- it will depend on the
      customer, the sophistication level that they have as
 9
10
      engineers, the degree to which their tools -- number
      of different features that their tools control and
11
12
      interact with will change the costs also. So I'm
13
      not sure -- I don't see an easy way to make a
14
      general statement here.
15
      BY MR. PAK:
16
           Q. Setting aside the cost or difficulty,
      purely as a technical question, there's no technical
17
18
      reason why a customer couldn't change their tools or
19
      convert their tools in some way to work with a
20
      different CLI interface if Arista was not allowed to
21
      use the Cisco-like IOS interface, correct?
22
           A. I believe in most cases it would be
23
      technically feasible to make those changes.
```

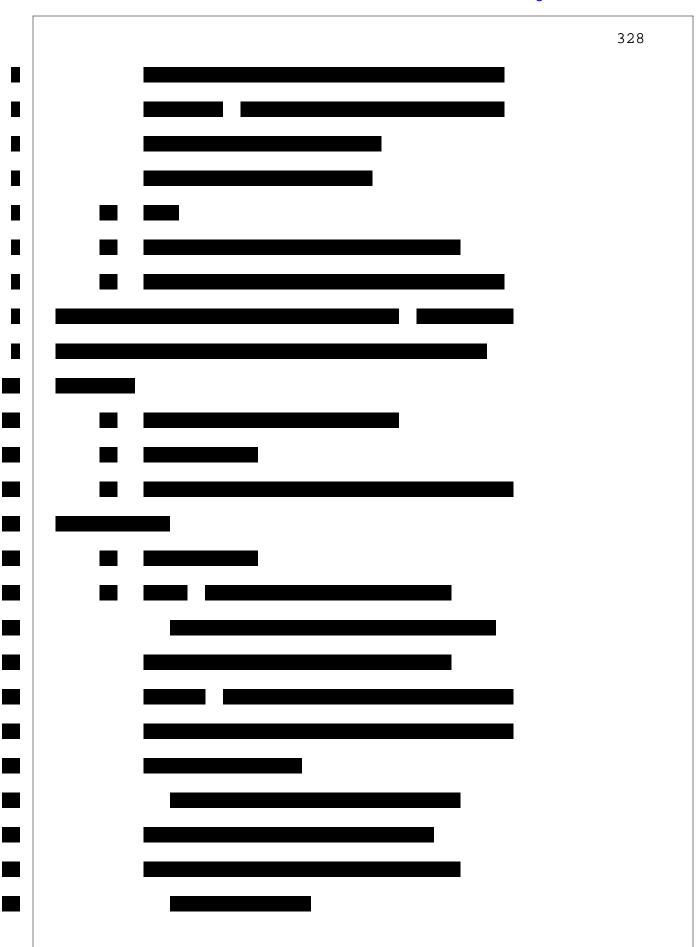






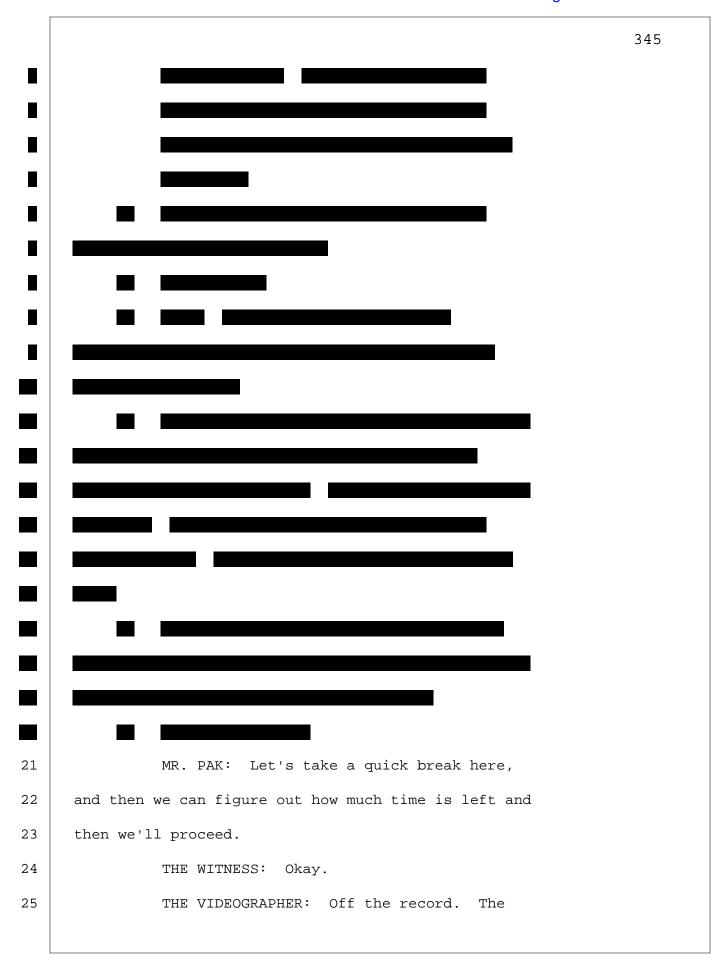












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346
 1
      time is 5:40 p.m.
 2
                (Recess taken at 5:40 p.m.)
 3
                THE VIDEOGRAPHER: On the record. The
      time is 5:47.
 4
                MR. PAK: All right. Mr. Duda, so I'm
 5
      going to introduce my next deposition exhibit,
 6
 7
      Number 273, which is a CD -- Exhibit 274.
 8
                (Off-the-record discussion regarding
                exhibit.)
 9
10
                (Duda Exhibit 274 was marked for
                identification and attached to the
11
12
                transcript.)
13
                MR. PAK: So, Mr. Duda, I've marked as
14
      Exhibit 274 a CD ROM that contains two video clips,
15
      or audio clips. One is the full audio clip of you
      presenting or talking as part of a Packet Pushers
16
17
      podcast. And there's a smaller file which is an
      excerpt from that long discussion that you had,
18
19
      which is Exhibit 274.
20
                So what I'm going to do is hand a copy to
21
      counsel.
22
                MR. SILBERT: Thanks.
23
                MR. PAK: I'm going to play, in the
24
      interest of time, the snippet, which is the clip
      that's on this CD, and ask you some questions about
25
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347
 1
      that.
 2
                Let me know if you can hear this.
 3
                THE WITNESS: Okay.
                (Video excerpt played from Exhibit 274.)
 4
                   "Oh, this is -- it's very simple. We
 5
 6
                want to minimize the transition cost to
 7
                our customers. Our customers come very
 8
                well trained, big stacks of people who
 9
                understand that particular CLI. And we
10
                actually copied it slavishly. You know,
11
                even the things we thought were really
12
                silly, we went ahead and copied them
13
                anyway because we wanted it to be as
14
                seamless an experience for our customers
15
                as possible.
16
                   "And something I'm still hoping that an
17
                enterprise customer -- an enterprising
                customer will do, is -- our CLI is just
18
19
                a -- it's just like the shell, right, just
20
                like Linux supports multiple shells,
21
                there's no reason why EOS can't have
22
                multiple CLIs. So if anybody wants to do
23
                a cool, modern CLI or EOS, hey, we're a
24
                real big fan.
25
                   (Overlapping speakers.)
```

```
348
 1
                   "That would be -- that would be a dream
                come true. So any volunteers to do a
 2
 3
                Juniper CLI, I have lots of milkshakes
                here. I'm very happy to finance the
 4
                activity that way."
 5
      BY MR. PAK:
 6
 7
                Did you give that interview?
           Ο.
 8
           Α.
                That sounded like me, sure.
 9
           Q.
                Do you recall doing that interview?
10
           Α.
                No.
                Okay. Do you deny that you told, as part
11
           Ο.
12
      of this podcast, that you slavishly copied the Cisco
13
      IOS?
14
                I'm not exactly sure what I said I
15
      slavishly copied in that interview. I think I
      probably referred to an industry standard command
16
17
      set, although I couldn't hear every -- every word
      there. As you know, we've, in some cases, followed
18
19
      CLI more faithfully than others.
20
                So I'm not sure exactly what "slavishly
21
      copied" means. I think that was true in the sense
22
      that I meant it at the time, meaning that we
23
      followed details as much as possible where we felt
24
      that those details were important for
      interoperability, where we felt like they were
25
```

```
350
 1
      BY MR. PAK:
          Q. And you're talking about the Cisco IOS CLI
 2
 3
     in that context, correct?
 4
          A.
               That's right.
           Q.
 5
               Okay. What were you talking about there
 6
      with respect to a Juniper CLI interface for Arista?
7
     Do you have a Juniper CLI interface today?
               We do not have a Juniper CLI interface
 8
          A.
9
     today.
10
          0.
               Okay. Did you ever consider implementing
11
      a Juniper CLI interface for Arista switches?
12
          A.
               Well, I think we considered obviously in
13
     that interview the possibility of multiple CLIs
     existing on the switch that might follow different
14
15
     styles or different patterns of command syntax.
16
          Q.
               That's technically feasible, correct?
               I believe that it is.
17
          A.
18
               And with enough engineering resources and
          0.
19
     time, you could develop a Juniper CLI interface for
20
     Arista Ethernet switches if you wanted to?
21
          A.
               Well, I'm not sure exactly what you mean
      by a Juniper CLI interface. Clearly it would be an
22
23
      interface to our switch, not Juniper's. I think it
24
      would be technically feasible to create a CLI that
25
      broadly follows the conventions of the Junos CLI.
```

```
351
1
                THE REPORTER: "Broadly follows..."
2
                THE WITNESS: -- the conventions of the
     Junos CLI.
3
4
     BY MR. PAK:
5
          Q.
               And that's J-u-n-o-s?
               That's correct.
6
           A.
7
          Q.
               Okay.
 8
                MR. PAK: Let me show you another clip.
      This one I'll mark as Exhibit 275.
 9
                (Duda Exhibit 275 was marked for
10
                identification and attached to the
11
12
                transcript.)
13
                MR. PAK: And, again, this one is actually
      a video interview that you gave, and on this CD we
14
15
      have the full entire video, as well as a small
16
      excerpt from that. I'm going to play the excerpt
17
      that shows you giving the interview, and I'm going
      to ask you a few questions. Okay.
18
19
                (Video excerpt played from Exhibit 275.)
20
                   "There are some customers who actually
21
                prefer to manage our -- our switches to
22
                the -- the Linux interfaces because their
23
                processes are already built and optimized
24
                around servers. But most customers --
25
                exactly what you said is right -- but they
```

	352
1	would really prefer to administer a switch
2	like a switch.
3	"Yeah.
4	"They have the years of training and
5	experience.
6	"Muscle memory, you know
7	"Exactly.
8	"Show ant, all that kind of stuff.
9	"Right, right. So it turns out that
10	you don't have to choose. You can
11	actually have it both ways. You can have
12	a true Linux environment and all of the
13	familiar management interfaces, standard
14	CLI, standard SNMP stack, OMI, if you
15	prefer to manage that way.
16	"All of these different management
17	interfaces are simply user processes
18	running on top of the the same SysDB
19	and Linux core as as all the rest of
20	the software. And we've found it's been
21	very helpful for our customers to be able
22	to rapidly adopt our products and
23	integrate them into their environments.
24	"It's been very helpful that our
25	switches provide a familiar management